



RS-00-23

June 9, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Notification of an Unsatisfactory Blind Performance Testing Incident as Required by 10 CFR 26, "Fitness for Duty Programs"

On May 10, 2000, a quality control negative specimen was received by MEDTOX Laboratories, Inc. (i.e., a Department of Health and Human Services (HHS)-certified laboratory) for a blind performance test. MEDTOX is the laboratory that performs analyses of Fitness for Duty urine specimens for the Commonwealth Edison (ComEd) Company. Subsequently, during a review of the specimen requisition form sent by the laboratory, a ComEd representative identified that the requisition form was not accompanied by the associated specimen test results. The ComEd representative

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confirmed that the specimen had been received by the laboratory. However, it was determined that due to human error the specimen was inadvertently not tested and was inappropriately identified as a negative specimen by the laboratory personnel. This error was determined to be unintentional. Attachment 1 provides a record of these investigative findings as required by 10 CFR 26, Appendix A, "Guidelines for Drug and Alcohol Testing Programs," Section 2.8, "Quality Assurance and Quality Control," paragraph (e)(4).

As required by 10 CFR 26, Appendix A, Section 2.8, paragraph (e)(4), Attachment 2 provides a record of the corrective action taken by the laboratory. Individuals involved in the incident were counseled regarding procedural adherence. In addition, the computerized tracking system utilized by the laboratory was upgraded to prevent a specimen from being documented as negative without having been tested, and to prevent specimen disposal until appropriate tests have been completed. When a specimen is received by the laboratory, a bar code identifier is applied to the specimen for tracking purposes. Once the testing is complete for a given batch of specimens, the requisition forms for the associated specimens with negative test results are documented in batch form as negative. The computerized tracking system was modified such that when the specimen bar code is read prior to specimen disposal, an associated specimen test result must exist or an audible indication will be actuated. This audible indication will prevent a specimen from being documented as negative without having been tested, and will prevent specimen disposal until appropriate tests have been completed. In response to the audible indication, the specimen without test results will be retrieved and required testing completed.

In accordance with 10 CFR 26, Appendix A, Section 2.8, paragraph (e)(4), we are submitting a report to the NRC within 30 days of an unsatisfactory blind performance testing incident, i.e., by June 9, 2000.

If you have any questions about this letter, please contact Ms. K. M. Root at (630) 663-7292.

Respectfully,



R. M. Krich
Vice President – Regulatory Services

Attachments

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Senior Resident Inspector – Byron Station
NRC Senior Resident Inspector – Dresden Nuclear Power Station
NRC Senior Resident Inspector – LaSalle County Station
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

ATTACHMENT 1

A RECORD OF THE INVESTIGATIVE FINDINGS

May 18, 2000

Ms. Judy Papaleo
ComEd Fitness for Duty Coordinator
1400 Opus Place, 5th Floor
Downers Grove, IL 60515

Dear Judy:

This is in regards to specimen number 19632088, Laboratory Accession Number G764194. The specimen was received at MEDTOX on May 10, 2000 at 3:57 a.m. It was assigned to a screening batch and the paperwork was processed for testing. It appears that during the aliquotting process, this specimen was skipped and was never opened. There are no test results in the system and this specimen number does not appear on the instrument print-out for it's assigned batch. The specimen requisition was signed as a negative in error by the negative certifying scientist.

When the error was brought to our attention, an attempt was made to retrieve the specimen and complete the testing. Unfortunately, negative specimens received on that date had been prepared for disposal and specimen number 19632088 could not be located. MEDTOX has a specimen handling system in place that utilizes barcode scanning to prevent disposal of a specimen prior to completion of testing; however, the system failed to detect the oversight in this situation.

Please accept our sincere apologies for this error. It has been brought to the attention of the Manager of the Specimen Processing Area and the Supervisor of the Negative Certifying Scientists as well. They will perform corrective action as indicated to prevent future occurrences.

Please let me know if you need any additional information or documentation.

Sincerely,



Jennifer A. Collins, Ph.D.
Director of Forensic Toxicology

ATTACHMENT 2

THE CORRECTIVE ACTION TAKEN BY THE HHS-CERTIFIED LABORATORY

June 06, 2000

Ms. Judy Papaleo,
ComEd Fitness for Duty Coordinator
1400 Opus Place, 5th Floor
Downers Grove, IL 60515

Dear Judy:

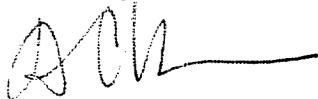
This correspondence is to provide additional detail regarding specimen number 19632088, Laboratory Accession Number G764194. As indicated in my letter of May 18, the specimen was received and processed on May 10, 2000, however, the sample was discarded prior to testing. This was an administrative error on the part of the laboratory.

Corrective actions taken in regard to this issue are as follows:

1. Supervisory personnel in Specimen Processing and Negative Certifying were notified of the error: individuals involved have been counseled with regard to proper procedures.
2. MIS personnel have reviewed the system protocol to ensure that the system provides ample indication to prevent specimen disposal while tests are pending. The system provides an audible signal and will not proceed until the specimen in question is scanned into a 'save' box. This latter provision has been added as corrective action.

Please let me know if you require any additional information regarding this issue.

Sincerely,



Jennifer A. Collins, Ph.D.
Director of Forensic Toxicology